

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

**BMW CREW, INC.
DEBTOR**

CASE # 16-00526

CHAPTER 11


MOTION TO EMPLOY ATTORNEY

TO THE HONORABLE COURT:

HERE COMES, Debtors who respectfully request and prays as follows:

1. Debtor filed a Chapter 11 petition on 2016.
2. Debtors have requested that the law office of Jacqueline E. Hernandez Santiago, Esq., to be their legal representative for this case.
3. The office, as representative of Debtors, have request from attorney Jacqueline E. Hernandez Santiago, Esq., to assume their legal representation.
4. Debtors have requested from the Legal Office of Jacqueline E. Hernandez Santiago, Esq. as their legal counsel for their case since she has considerable experience in bankruptcy proceedings. In addition, the undersigned understands that the Legal Office of Jacqueline E. Hernandez Santiago, Esq. will duly represent him in his best interest.
5. The law office of Jacqueline E. Hernandez Santiago, Esq. will represent Debtors in this case and in all matters related.
6. The professional services the legal office of Jacqueline E. Hernandez Santiago, Esq. will render includes, inter alia:

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- (a) Advice Debtors with respect to his duties, powers and responsibilities in this case under the laws of the United States and Puerto Rico in which the debtor in possession conducts the operations, do business or is involved in litigation;
 - (b) Advice Debtors in connection with the determination, whether reorganization is feasible and, if not, help them in the orderly liquidation of their assets.
 - (c) Assist Debtors, with respect to the negotiations with creditors, (1) for arranging the orderly liquidation of assets, and/or (2) for proposing a viable plan of reorganization.
 - (d) Prepare on behalf of Debtors necessary complaints, answers, orders, reports, memoranda of law and/or any other legal papers or documents, including a Disclosure Statement and a Plan of Reorganization.
 - (e) Perform the required legal services needed by Debtors to proceed or in connection with the operation of and involvement with their business.
 - (f) In addition, perform the professional services as necessary for the benefit of Debtors and of the estate.

7. To the best of Debtors' knowledge neither (a) the law office of Jacqueline E. Hernandez Santiago, Esq. nor any of its members or employees (I) have any connection with the Debtors, Creditors, any other party in interest, their attorneys and accountants, the United States Trustee, or (II) represents or holds any interest adverse to Debtors or the estate on the matters upon which the

Legal Office of Jacqueline E. Hernandez Santiago, Esq. is to engage, and (b) the Legal office of Jacqueline E. Hernandez Santiago, Esq. is a "disinterested" person within the meaning of 11 USC §101 (14).

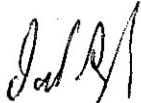
8. The propose arrangement of compensation is an agreed rate of \$ 250.00 per hour for attorney, a retainer of \$ 5,000.00. In addition Debtor paid \$ 1,717.00 for the filing fee. The hourly rate is subject to change with the passage of time upon prior notice.

WHEREFORE, Debtors, herein respectfully request from this Honorable Court to enter an Order approving the employment of Jacqueline E. Hernandez Santiago, Esq. pursuant to §327 (a) of the United States Bankruptcy Code to represent Debtors in this Chapter 11 case.


RESPECTFULLY SUBMITTED.

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I CERTIFY that a copy of this motion has been electronically filed with the Clerk of the Bankruptcy Court using CM/ECF which will forward a copy of the same to the office of US Trustee, Chapter 11 Trustee, and by regular mail to all creditors as per master address list.

In San Juan, Puerto Rico, this 28TH day of January of 2016.



DAVID GONZALEZ SUAREZ
In its capacity as PRESIDENT of
BMW CREW, INC.
Debtor in Possession



JACQUELINE E. HERNANDEZ SANTIAGO, ESQ.
ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

BM CREW, INC.

DEBTOR

CASE # 16-00526

CHAPTER 11

**CERTIFICATE OF PROPOSED ATTORNEY
AND VERIFIED STATEMENT**

I, JACQUELINE HERNANDEZ SANTIAGO, do hereby certify under penalty of perjury that to the best of my knowledge, information and belief, the following is true and correct:

1. I, JACQUELINE HERNANDEZ SANTIAGO am an attorney fully admitted to practice the profession in Puerto Rico, and have an office at 22 Mayaguez Street, Hato Rey, Puerto Rico 00918, with a postal address as PO BOX 366431, San Juan, Puerto Rico, 00936-6431, and telephone 787-766-0570, and fax 787-946-7522.
2. I am competent to represent the interest of Debtors and fulfill the requirements of this Court, and I am familiar with the United States Bankruptcy Code and the Bankruptcy Rules and the local Rules of the United States Bankruptcy Court for the District of Puerto Rico.
3. Neither I, nor any of my employees holds or represents any interest adverse to the estate of BM CREW, INC., Debtor, and I and all my employees are disinterested persons as the term is defined in 11 USC section 101 (14) and have no connection with the Debtor, creditors, any other party in interest, their respective attorneys and

accountants, the United States Trustee, or any person employed in the office of the United States Trustee other than as disclosed herein.

4. The source of the compensation paid or promised to be pay shall be from Debtors' operation of business.
5. The arrangement of compensation is \$250.00 hourly rate plus any additional cost and expenses. Debtor provided the sum of \$5,000.00 as a retainer and \$0.00 for expenses, except the payment of the filing fee in the amount of \$1,717.00.
6. There are no agreements on our part for the sharing of any compensation or reimbursement received or to be received under the 11USC sections 330(a) and 503 (b) (2) or otherwise in connection with this case nor will I share any such compensation or reimbursement received by another person under such sections.
7. Approval of Debtors' employment of JACQUELINE HERNANDEZ SANTIAGO as their attorney is sought with respect to all proceedings in which debtors may be reasonable expected to act.
8. There are no agreements on our part for the sharing of any compensation or reimbursement received or to be received under the 11USC sections 330(a) and 503 (b) (2) or otherwise in connection with this case nor will I share any such compensation or reimbursement received by another person under such sections.
9. This statement will be amended immediately upon learning that: (a) any of the representations made herein are incorrect, or (b) any change of circumstance in relation to the representations made in this statement occurs.

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10. I submit this statement in accordance to section 327 of the Bankruptcy Code, 11 U.S.C. section 327, Bankruptcy Rule 2014 and Local Bankruptcy Rules 2014-1 and 2016-1.

WHEREFORE, I, JACQUELINE HERNANDEZ SANTIAGO, respectfully request from this Honorable Court to enter an order authorizing my employment as attorney for Debtor, BM CREW, INC., in this Chapter 11 case.

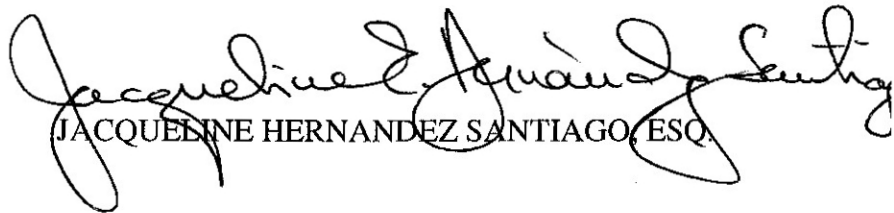
RESPECTFULLY SUBMITTED.

I CERTIFY: That a copy of this document has been electronically filed with the Clerk of the Bankruptcy Court using CM/ECF and a copy of the same forwarded to the United States Trustee and to all parties in the master address list.

In San Juan, Puerto Rico this 28TH day of January, 2016.



Signed by DAVID GÓNZALEZ SUAREZ,
In its capacity as PRESIDENT of
BM CREW, INC.,
Debtor in Possession



JACQUELINE HERNANDEZ SANTIAGO, ESQ.

JACQUELINE E. HERNANDEZ SANTIAGO

Calle Mayagüez #22, Interior
Hato Rey, PR 00917
(787) 766-0570
quiebras1@gmail.com

Objective

To further develop my knowledge as a legal professional within the Bankruptcy Law Practice in order to help the low and median income families in their financial problems, and forward such knowledge to young generations of lawyers willing to help the troubled families of Puerto Rico residents.

Qualifications

Work in an organized manner
Always being known as a responsible person regarding my work and duties assigned
Work as a very discrete person in my job
Perform duties as soon as asked
Willing to help others

Education

1983- 1985	Interamerican University of Puerto Rico, School of Law Juris Doctor	San Juan, PR
1979-1983	University of Puerto Rico BBA Major in Accounting and Minor in Computers	San Juan, PR

Relevant Experience

1993-to present	Hernandez Law Offices Associate Attorney	Hato Rey, PR
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-Extensive litigation in Bankruptcy Law representing debtors and creditors in Chapters 7, 11 and 13.
- Filing and litigation of adversary proceedings before the US Bankruptcy Court relating different bankruptcy, commercial and state law.
-Prepare trial briefs

1993-1990	Amado Pereira and Associates Associate Lawyer	San Juan, PR
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-Interview of clients
-Draft and filing of bankruptcy petitions and motions
-Attend all hearings before the US Bankruptcy Court
-Extensive litigation in Bankruptcy Law representing debtors and creditors

- 1989-1988 Corporación de Crédito Agrícola San Juan, PR
Director of Legal Division
- officers
- Attend personnel problems and give legal advice to administrative and personnel
 - Draft legal opinions
 - Draft proposed administrative procedures and rules, manuals for the implementation of such administrative procedures and rules
 - Attend different meetings with administrators of different government agencies in an effort to implement public policies and federal regulations relating with the agricultural community of Puerto Rico
 - Attend bankruptcy litigation in Puerto Rico and New York jurisdiction representing the government of Puerto Rico
 - Perform duties as a Notary Public
 - Involved in collective bargaining agreements negotiations and arbitration hearings
 - Research for civil and bankruptcy cases
 - Drafting motions, summary judgments, interrogatories, production of documents
 - Taking of depositions
- 1989-1986 Centro Judicial de San Juan San Juan, PR
Law Clerk
- and civil law
- Extensive research in all areas of law including criminal, torts, bankruptcy, family
 - Drafting of final judgments and opinions for all areas of law pending before the consideration of all judges in the San Juan State Courts
 - Research on international treaties including the Haya Convention

Continued Legal Education

- 2010 Bankruptcy Law- Recent Developments, sponsored by the Colegio de Abogados de Puerto Rico
- 2009 National Association of Consumer Bankruptcy Attorneys Annual Convention, Chicago, Illinois-
- 2009 National Organization of Social Security Claimant's Representatives (NOSSCR) Annual Conference, San Francisco, California
- 2008-2011 Different Seminars sponsored by the Colegio de Abogados de Puerto Rico relating update on jurisprudence, notary law, family law, ethics and contract law, among others.
- 2006 Interamerican University Continued Legal Education Institute - Chapter 12 under the Bankruptcy Law
- 2005 Colegio de Abogados de Puerto Rico Annual Convention – Bankruptcy Seminar

2005 Puerto Rico Bankruptcy Bar Association - Bankruptcy Abuse and Prevention Consumer Protection Act

2005 National Association of Consumer Bankruptcy Attorneys, Chicago, Illinois - Surviving the Bankruptcy Abuse and Prevention Consumer Protection Act

1985-2005 Different Seminars sponsored by the Colegio de Abogados de Puerto Rico relating update on jurisprudence, notary law, family law and administrative law.

1985-2005 Different Seminars sponsored by the Puerto Rico Bankruptcy Bar Association relating bankruptcy law

Speaker for:

Consumer Credit Counseling 2006

Fundamentals of Bankruptcy Law and the Bankruptcy Abuse and Prevention Consumer Protection Law

Licenses

Admitted to practice law in the Supreme Court of Puerto Rico 1985

Admitted to practice law in the United States District Court for the District of Puerto Rico 1986

Admitted to practice law in the United States Court of Appeals for the First Circuit 1986

References Available Upon Request